

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DORAL BANK PUERTO RICO, on Behalf of  
Itself and All Others Similarly Situated,

Plaintiff,

vs.

WASHINGTON MUTUAL ASSET  
ACCEPTANCE CORPORATION, et al.,

Defendants.

No. 2:09-cv-01557-MJP

CLASS ACTION

DECLARATION OF DOUGLAS C.  
MCDERMOTT IN SUPPORT OF GREATER  
PENNSYLVANIA CARPENTERS PENSION  
FUND'S MOTION FOR APPOINTMENT OF  
LEAD PLAINTIFF AND APPROVAL OF  
SELECTION OF COUNSEL

NOTE ON MOTION CALENDAR:  
MARCH 12, 2010

ORAL ARGUMENT REQUESTED

1 I, DOUGLAS C. McDERMOTT, declare under penalty of perjury that the following is true  
2 and correct:

3 1. I am a member of the law firm McDermott Newman, PLLC, counsel for Greater  
4 Pennsylvania Carpenters Pension Fund (“Movant” or “Greater Pennsylvania”) and proposed local  
5 counsel for the class. I am competent to testify and base this declaration on personal knowledge and  
6 the records of my firm. I submit this declaration in support of Greater Pennsylvania Carpenters  
7 Pension Fund’s Motion for Appointment as Lead Plaintiff, and Approval of Selection of Counsel.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Notice of Pendency of Class Action published on *Business Wire*, a national  
10 business-oriented wire service, dated December 24, 2010;

11 Exhibit B: Movant’s Sworn Certification;

12 Exhibit C: Frayser White, *FBI Subprime Probe may Reach Wall Street*, SNL Bank  
13 and Thrift Daily, Apr. 21, 2008;

14 Exhibit D: Matthias Rieker, *In Brief: Countrywide Exec Named Doral Treasurer*,  
15 American Banker, Sept. 11, 2006; and

16 Exhibit E: Firm résumé of Coughlin Stoia Geller Rudman & Robbins.

17 I declare under penalty of perjury under the laws of the State of Washington that the  
18 foregoing is true and correct. Executed this 22nd day of February 2010, at Seattle, Washington.

19 s/ DOUGLAS C. McDERMOTT  
20 DOUGLAS C. McDERMOTT

1 CERTIFICATE OF SERVICE

2 I hereby certify that on February 22, 2010, I electronically filed the foregoing with the Clerk  
3 of the Court using the CM/ECF system which will send notification of such filing to the e-mail  
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have  
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF  
6 participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct. Executed on February 22, 2010.

9 s/ DOUGLAS C. McDERMOTT

10 DOUGLAS C. McDERMOTT

11 McDERMOTT NEWMAN, PLLC

12 DOUGLAS C. McDERMOTT

13 1001 Fourth Avenue, Suite 3200

14 Seattle, WA 98154

15 Telephone: 206/684-9463

16 206/749-9467 (fax)

17 E-mail: [doug@mcdermottnewman.com](mailto:doug@mcdermottnewman.com)

# Mailing Information for a Case 2:09-cv-01557-MJP

## Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **James J. Coster**  
jccoster@ssbb.com,managingclerk@ssbb.com,jregan@ssbb.com
- **Larry Steven Gangnes**  
gangnesl@lanepowell.com,sebringl@lanepowell.com,docketing-sea@lanepowell.com,donnellyjoss@lanepowell.com
- **Christopher M Huck**  
Christopher.huck@dlapiper.com,karen.hansen@dlapiper.com
- **Stellman Keehnel**  
stellman.keehnel@dlapiper.com,patsy.howson@dlapiper.com
- **Joel P Laitman**  
jlaitman@cohenmilstein.com
- **Christopher E Lometti**  
clometti@cohenmilstein.com
- **Bradley T. Meissner**  
bradley.meissner@dlapiper.com
- **Nancy A Pacharzina**  
npacharzina@tousley.com,kzajac@tousley.com
- **Daniel B Rehns**  
drehns@cohenmilstein.com
- **Kenneth M Rehns**  
krehns@cohenmilstein.com
- **Rogelio Omar Riojas**  
omar.riojas@dlapiper.com,nina.marie@dlapiper.com
- **Joshua M. Rubins**  
jrubins@ssbb.com,managingclerk@ssbb.com,jregan@ssbb.com
- **Kim D Stephens**  
kstephens@tousley.com,kzajac@tousley.com,cbonifaci@tousley.com
- **Steven J Toll**

stoll@cohenmilstein.com,efilings@cohenmilstein.com

## **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)